STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP Inspection
Metal Management Aerospace, Inc.
500 Flatbush Avenue
Hartford, CT 06106

General Information:

On August 23, 2005 Lori Saliby received an e-mail from Mark DeCaprio of OCSRD regarding Metal Management Aerospace, Inc. in Hartford, CT. Brian Emanuelson of OCSRD responded to an incident there on August 21, 2005, in which an employee was burned by caustic material. While at the site, Brian noticed other areas of interest, including three old oil tanks labeled PCB with oil spillage in the dike. An oily sheen was noted on the water surface to an adjacent marsh connected to the outfalls.

Referrals were made to other DEP Programs, including WEED, and Remediation. Brian arranged for a follow-up inspection.

Inspection Summary:

On August 31, 2005 I met Brian Emanuelson at the front gate of Metal Management Aerospace, Inc. We met Ray Frigon and Lee Suarez of the DEP Planning and Standards Remediation Division. Ray Frigon stated there is a trench that runs through the property that contains groundwater that consistently has PCB's between 200-300ppm. I stated I was unaware of this information and have not received any data on these conditions. We proceeded to the main building office and were met by Dan Mullen, the Quality Engineer.

I stated I spoke with him in 2003 regarding fish with PCB's that were found in the Park River. He recalled the conversation. During the previous inspection, I requested information on any PCB activity or equipment on site and was told there were no PCB's at this facility. I was only able to obtain a few copies of outfall testing from Carol Papp of the DEP Aquatic Toxicity Program. Trace amounts of PCB's were documented, but not all of the outfalls were tested specifically for PCB's.

Mr. Mullen explained that the property is owned by the Danny Corporation, which is primarily Mike Suisman. The remediation of the soil and the oil from the groundwater recovery systems are the Danny Corp.'s responsibility. Metal Management Aerospace leases the property and is responsible for the storm-water maintenance.

I requested to inspect the three tanks, which were labeled PCB, reported by Brian. These were located on the west side of the site and were adjacent to the railroad tracks. A concrete wall separated the property from the tracks.

Mr. Mullen stated the tanks were part of a recovery system for the ongoing PCB remediation, which was addressed in 1985 and 1988 DEP Consent Orders. Roy F. Weston of Glastonbury was the consultant whose plans were accepted by the DEP at the time.

There are actually five tanks instead of three. These are called the Weston Tanks and were constructed in 1990 (Photos 01-07). Each tank is ML labeled and is situated in a steel lined three-foot high concrete berm. The steel liner was installed in 1995. The five tanks are used to decant water from the Weston Sump.

Two of the "tanks" are actually metal dumpsters with plywood covers. There are oily rags plugging small holes in the upper portion of the sides. The other three tanks are open-ended circular tanks with plywood covers. All five tanks had weepage on the sides and around the rims. The closest catch basin was dry and filled with sand. The pipe opening had plug installed.

The berm did not have a drain and is pumped out when necessary. It is unknown how the contaminated water is treated. Currently, the berm has a small amount of water and is mixed with an oily layer and some dirt (Photo 08 and Sample 030PCB05).

The final decant tank (Photo 06) is pumped once a year and two to three drums of PCB oil are removed and disposed of as PCB. I requested copies of the manifests for the last five years from this system.

Mr. Mullen explained the operation of the decant system as follows: the PCB recovery trenches fill with oily groundwater, which it is skimmed off into two settling tanks. The oily groundwater from the two Weston Sump settling tanks are pumped out and taken to the Weston Tanks Decant System. The four tanks are decanted with hoses and a portable pump into a final fifth tank where the oil is drummed and disposed as PCB waste. The remaining water is pumped out of the tanks and discharged into the outfalls. I requested copies from the sampling of this water.

The same 1,000gallon vac truck and hose is used in-house for different projects and to pump out various catch basins throughout the site. The truck and hose are never decontaminated between pumping projects, including the PCB recovery decant systems. I collected a sample from the valve of the almost empty vac truck (Sample028PCB05). We had to collect the sample over a pitched area since there would be some spillage when we opened the valve. Mr. Mullen stated the truck regularly empties its contents over this area. I stated there might be cross-contamination with PCB's also in this area.

The pitched area did not have a berm or curb and was a large open exposed area covered with a thick oily light gray sludge. Two workers were standing in the middle of the sludge and were using squeegee brooms to move the material to a catch basin, which allegedly went to the ultrafilter. The stormwater run-off goes through the ultrafilter and is discharged through the

outfalls. The workers were not wearing protective clothing or respirators. I contracted a severe headache just standing in this area.

We proceeded to the outfall area. The Weston Sump cover had oily staining and so did the surrounding soil. I observed outfall # 2, which had black staining and emulsified oil on the small amount of pooled water. The absorbent boom was also stained. I obtained a sample from the sediment under outfall #2 (Sample 029PCB05). ~1.92ppm

Mr. Mullen stated there is a total of eight outfalls for the entire site. Brian and Ray climbed down the embankment and found black staining and blackened booms in each of the four outfalls in this area. There is a skimmer pond with an oily sheen. Outfall #1 empties into a small brook, which discharges directly into the Park River. I requested outfall data for the last five years.

Drums of metal shaving are collected and rinsed off. The rinsate goes into the ultrafilter. Small amounts of metal shaving piles were observed throughout the site. A street sweeper is regularly run throughout the property to clean the oil staining and shavings.

We inspected the north shredder area of the property. Small piles of scrap metal were observed, but no white goods or PCB equipment is currently in storage. I spoke with Eugene Klein at this point, he stated the decant and perforated clay pipe and interceptor trench systems were built in-house in response to a 1990 DEP Consent Order, which were approved and signed off by Lori Saliby and Mike Dezzani. I stated they were involved in a PCB contaminated soil removal project and not the recovery systems.

Mr. Klein tried to explain how the system operates. He stated two sumps collect groundwater and PCB oil seepage. The oil is skimmed off and sent to the decant system. The water is tested and sent through the outfalls. He stated the water always tests non-detectable for PCB. I requested copies if the oil and water analysis for the last five years. Mr. Mullen and Mr. Klein gave several explanations for how the water left over from the decant system is disposed. It either goes to the sanitary sewer, through the ultrafilter, or is discharged to the outfalls after it tests negative for PCB's. Mr. Klein stated one to two drums of PCB oil is collected yearly from the decant system. It usually tests between 200-300ppm PCB.

The following week I spoke with Mr. Suisman's attorney, Allen Kosloff. He stated the Danny Corp. leased the business and operation to Metal Management Aerospace in 1998. The transaction went under the Transfer Act and was approved by the DEP. Todd Wallace is the consultant from Weston Solutions. Mr. Kosloff stated there is site-wide PCB soil contamination. A Phase II study was performed by Weston and the areas of PCB contamination were identified. I requested copies of the report and stated the work plan and sampling approach would need EPA oversight.

Mr. Kosloff stated they have had an ongoing dispute with the tenant over storm water management issues. I stated they should have contacted the CT DEP Storm Water Program to assist in resolving these issues. He stated they did not want to take that route. Mr. Kosloff stated Metal Management was issued the Storm Water Permit under Jim Grier. Mr. Kosloff stated that

oily water regularly overflows the Abcor and the catch basins. He stated the PCB's on the site probably came from the cutting oils from the metal shavings that Metal Management collects from UTC. These oils are diluted and flushed out over time. I stated we should approach the site from the inspection onward and to identify the ongoing problems and come up with interim solutions under the guidance of the DEP and EPA. Mr. Kosloff offered to come up with some in-house remedies, but I told him to wait until he heard from the DEP or EPA in writing and he would need an LEP to coordinate any remedial actions.

Documents: none taken

Samples: 028-030PCB05 Sediments

Photos: 01-08 Decant System

Attachments: 01 Memo from OCSRD
02 Multimedia Checklist
03 FITS

Janet Kwiatkowski
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The Connecticut Agricultural Experiment Station

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Report of Sample Submitted by: **Department of Environmental Protection**

Agency Division: ***Bureau of Waste Management; Pesticide, PCB Div.***

Sample Number: **030PCB05**

Report Prepared: **08-Sep-05**

Station Number: 05.763

CAES Database Log-In Date: 01-Sep-05

Sample Type: **Sediment**

Description: ***Sediment***

Site: Metal Mgt.
500 Flatbush Ave., Hartford, CT

Date Collected: August 31, 2005
Note: collected from three sides of the steel containment berm for the Weston tanks.
Laboratory Blank: MAE blank

Spike Recovery: 52%

Results of Analysis: 71.57ppm PCBs Aroclor 1248.

Mary Jane Mattina
Head, Department of Analytical Chemistry

The Connecticut Agricultural Experiment Station

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Report of Sample Submitted by: **Department of Environmental Protection**

Agency Division: ***Bureau of Waste Management; Pesticide, PCB Div.***

Sample Number: **029PCB05**

Report Prepared: **08-Sep-05**

Station Number: 05.762

CAES Database Log-In Date: 01-Sep-05

Sample Type: **sediment outfall #2**

Description: ***sediment outfall #2***

Site: Metal Mgt.
500 Flatbush Ave., Hartford, CT

Date Collected: August 31, 2005
Note: collected from swale directly under pipe
Laboratory Blank: MAE blank
Spike Recovery: 52%

Results of Analysis: 1.92ppm PCBs calculated as average of Aroclors 1254 and 1260.

Mary Jane Mattina
Head, Department of Analytical Chemistry

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Report of Sample Submitted by: **Department of Environmental Protection**

Agency Division: ***Bureau of Waste Management; Pesticide, PCB Div.***

Sample Number: **028PCB05**

Report Prepared: **08-Sep-05**

Station Number: 05.761

CAES Database Log-In Date: 01-Sep-05

Sample Type: **Water and sediment**

Description: ***Water and sediment***

Site: Metal Mgt.
500 Flatbush Ave., Hartford, CT

Date Collected: August 31, 2005
Note: collected directly from the valve of the vac truck.
Laboratory Blank: MAE blank

Spike Recovery: 52%

Results of Analysis: 0.19ppm PCBs calculated as Aroclor 1248 in sediment

Mary Jane Mattina
Head, Department of Analytical Chemistry